

Message

From: Cliff Boyd [cliff.boyd@calbag.com]
Sent: 7/8/2017 2:34:28 AM
To: Cirian, Mike [Cirian.Mike@epa.gov]
Subject: FW: fill for ramps / pressure washing concrete / CFAC

Hi Mike

Hope your trap / skeet match went well. Below is a email I received from MDEQ and the basis for my calls to you on your cell phone. Thanks for returning my calls, sorry we missed each other.

Calbag is obsessed with complying with all regulatory agencies involved in the CFAC property as pertains to the demolition work and the removal of K088 waste. I am in an awkward place as the Project Manager trying to execute this work. CFAC is asking me to do more work pressure washing concrete as directed in the June 07, 2017 letter you provided to Roux and CFAC. (CFAC provided me copy of the letter). MDEQ is requiring I modify the approved Waste Management Plan as a result of the pressure washing, and I'm a contractor pretty much wedged in the middle trying to maintain and keep CFAC, The EPA and MDEQ content.

Passing on the MDEQ email on below. Hope we can chat on Monday.

Very Best,

Cliff Boyd
Director of Asset Recovery
U.S Operations Group
Oregon Office 503-226-3441
Cell 406 360-0751

From: Mikita, Cory [mailto:CMikita@mt.gov]
Sent: Friday, July 07, 2017 5:08 PM
To: Cliff Boyd; Norris, Kathryn
Cc: Rieger, Michael
Subject: RE: fill for ramps.

The sludge or rinsate may become a hazardous waste especially after evaporation, creating an increased concentration of the original constituents of concern that are being washed off the concrete.

Cory Mikita
Environmental Science Specialist
DEQ Waste & Underground Tank Management Bureau
(406)-444-1435
cmikita@mt.gov

From: Cliff Boyd [mailto:cliff.boyd@calbag.com]
Sent: Friday, July 07, 2017 4:51 PM
To: Mikita, Cory; Norris, Kathryn
Cc: Rieger, Michael
Subject: Re: fill for ramps.

I will get with Katy. Why would pressure washing a agreed non hazardous waste after testing to the requirements of the QAP / SAPP in the WMP create a new non hazardous determination. Calbag is only following the June 07, letter from The EPA

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Mikita, Cory" <CMikita@mt.gov>
Date: 7/7/17 4:30 PM (GMT-07:00)
To: Cliff Boyd <cliff.boyd@calbag.com>
Cc: "Rieger, Michael" <MRieger@mt.gov>
Subject: RE: fill for ramps.

Thanks Cliff,

To address the washing as directed by the EPA, the Waste Management Plan will need an amendment to address activities such as sludge/wastewater characterization and disposal.

Best regards,

Cory Mikita
Environmental Science Specialist
DEQ Waste & Underground Tank Management Bureau
(406)-444-1435
cmikita@mt.gov

From: Cliff Boyd [<mailto:cliff.boyd@calbag.com>]
Sent: Friday, July 07, 2017 2:59 PM
To: Mikita, Cory; Rieger, Michael; 'kathryn.norris@tetrattech.com'; Jim Perris
Subject: fill for ramps.

Cory

As a follow-up to our phone call today with respect to the call your department received about dirt being moved from the side of the hill next to CFAC. The dirt is from the MDEQ approved Open Cut Mine (permit #2724)

Attached is picture of where clean fill was placed to ramps into room 1 to remove the concrete as required and described in the MDEQ Waste Management Plan.

The concrete floor surface below the ramp was broom swept and pressure washed as required in the EPA June 07, 2017 letter prior to the ramp being built.

Cliff Boyd
Director of Asset Recovery
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